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Home Entertainment Inc. and Disney Enterprises, Inc.
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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 Warner Bros. Home Entertainment Inc.
and Disney Enterprises, Inc.,

12 Plaintiffs,

13 v.

14 Franklyn Perez, and Does 1 – 10,
15 inclusive,

16 Defendants.
17

Case No.

DECLARATION RE JOINDER

18
19 **DECLARATION OF J. ANDREW COOMBS**

20 I, J. Andrew Coombs, declare as follows:

21 1. I am an attorney at law, duly admitted to practice before the Courts of
22 the State of California and the United States District Court for the Central District of
23 California. I am attorney for Plaintiffs Warner Bros. Home Entertainment Inc. and
24 Disney Enterprises, Inc. (collectively “Plaintiffs”) in an action styled Warner Bros.
25 Home Entertainment Inc., et al. v. F. Perez, et al. I submit this Declaration
26 supporting joinder of copyright claims in one action, as provided by Local Rule 19-2
27 of the United States District Court for the Central District of California, formerly
28 Local Rule 3.7.2.2. Except as otherwise expressly stated to the contrary, I have

1 personal knowledge of the following facts and, if called as a witness I could and
2 would competently testify thereto.

3 2. The interests of justice will be advanced through joinder of Plaintiffs'
4 claims for copyright infringement and related contributory liability claims and
5 pendent state law claims for the following reasons:

6 a. First, I am informed and believe that the Defendant's mode of
7 conducting business requires the Plaintiffs to act in concert. It is far more
8 likely that the Plaintiffs will succeed in coordinating these enforcement efforts
9 where relief is sought in one action, in one proceeding, before one Court.
10 Even were separate actions "related", which is not certain, it would still
11 remain possible that proceedings would not necessarily proceed on the same
12 schedule.

13 b. Second, the interests of justice are served because the Plaintiffs
14 seek to vindicate similar rights. While different intellectual properties are
15 involved, my experience with similar cases suggests that the most vigorously
16 contested issues will involve Defendant's conduct, intent and ability to
17 compensate Plaintiffs for their acts. These issues will be the same with respect
18 to each Plaintiff. Accordingly, not only are the interests of justice advanced
19 through joinder, the risk of prejudice is reduced and judicial economies are
20 advanced.

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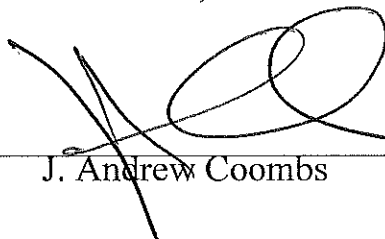
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1 c. Accordingly, joinder of the Plaintiffs' claims herein will avoid a
2 multiplicity of actions involving substantially the same issues, the same
3 preliminary procedures and the same final relief.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed this 9th day of March, 2016 at Glendale, California.

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J. Andrew Coombs